

DEPARTMENT OF ECOLOGY

IN THE MATTER OF AIR EMISSIONS FROM) ORDER
PORT TOWNSEND PAPER CORPORATION) No. DE 05AQIS-2892

This Order **DE 05AQIS-2892** is issued pursuant to authorities set forth in Chapter 70.94 RCW, including RCW 70.94.141(3), .152, .153, and .331; and WAC 173-400-110. Any conditions of the order issued pursuant to authorities other than those noted in the prior sentence, will cite the authority within the condition. The requirements set forth in this Amended Order describe specific air emission limitations and operating conditions, as well as methods, frequency and format for required monitoring and reporting. All regulations cited in this Order are those in effect on the date of Order issuance.

Background and Historical Context: This Order modifies and supercedes the previous order DE 00AQIS-131 which consolidated several individual orders and amended portions of the air quality requirements applicable to the kraft pulp and paper mill (Mill) operated by Port Townsend Paper Corporation (PTPC). The principal action is the exclusion from this order of applicable requirements stipulated by regulation. Their presence in any order is unnecessary but their inclusion in any order creates a duplicative and stand-alone requirement. The underlying effort is to continue to modernize and streamline air orders to better accommodate incorporation into Title V air operating permits.

Previously issued Order DE 00AQIS-131 superseded and repealed the orders below:

ORDER No. DE 93-AQI063 issued July 6, 1993 - Order limiting emissions from the recovery furnace corresponding with issuance of a Certificate of Emission Reduction Credit.

ORDER No. DE 92-AQI057 issued August 13, 1992 and rescinded July 6, 1993.

ORDER No. DE 88-195 issued May 31, 1988 - NOC Order requiring installation of a Waterloo scrubber at Power Boiler #10 and setting appropriate conditions.

ORDER No. DE 87-107 issued January 27, 1987 - Order requiring demonstration of backup boiler start up in compliance with opacity limits.

ORDER No. DE 85-209 issued March 14, 1985 - Order requiring monthly particulate source testing at Power Boiler #10.

ORDER No. DE 84-390 issued June 20, 1984 - Order and NOC limiting mill emissions and emissions associated with a mill expansion to produce approximately 650 tons per day of unbleached kraft pulp and paper. Appendix A of the Order is PSD-I, which addresses PSD issues associated with the mill expansion. PSD-I has not been modified and is included as Appendix A of this Order.

ORDER No. DE 82-291 issued July 1, 1982 - Concerning noncondensable gas (NCG) venting.

All other ORDERS issued prior to 1984.

Order 00AQIS-131 amended some of the existing non-PSD air operating requirements. The requirements were modified or eliminated because:

1. limits were redundant,
2. limits were less stringent than those found in another order,
3. measurement units were not consistent,
4. requirements/studies were related to time periods which have passed, and/or
5. requirements were no longer applicable.

The changes of the type in Items 1, 2, and 3 were found to be environmentally insignificant. The changes of the type in Items 4 and 5 were found to be acceptable because requirements were obsolete.

Order 05AQIS-2892 amends previously issued Order 00AQIS-131 by removing those conditions which are restatements of existing applicable regulations. The regulations are still applicable and the conditions are still in the Title V operating permit. The conditions were eliminated because their absence from this order makes them no less applicable but their presence creates an unintended potential mandate. If the underlying regulation changed but the original regulatory wording was present in an order, both requirements would be applicable.

CONDITIONS:

1. The emissions limits specified in Table 1 shall not be exceeded.
2. The emission limits shall be monitored at the monitoring frequency and with the compliance test methods specified in Table 1. The department may approve alternate compliance test methods that are of equivalent stringency for any air pollutant. Compliance monitoring frequency may be adjusted by Ecology depending on compliance history.
3. All periodic emission sampling shall be done at equipment operating rates which are equal to or greater than the average operating monthly rate of the previous month.
4. Sampling ports and platforms must be provided for each affected source after the final pollution control device. The ports must meet the requirements of Reference Method 1 of 40 CFR, Part 60, Appendix A. Other arrangements may be acceptable if approved by the department prior to installation. Adequate permanent and safe access to the test ports must be provided.
5. Reserved.
6. The PTPC continuous emission monitoring quality assurance plan must be updated as necessary and maintained on site. Ecology may require the continuous emission

monitoring quality assurance plan to be periodically updated in the future. The updates shall satisfy 40 CFR, Part 60, Appendix F.

7. Data required to demonstrate compliance with emission limits in Table 1 shall be reported in written form to the Washington Department of Ecology Industrial Section or its authorized representative at least monthly (unless a different testing and reporting schedule has been approved by Ecology). The report shall be submitted in conformance with the time requirements included in WAC 173-405 072 (**within 15 days of the end of each calendar month**). The report shall be in a format approved by Ecology. Report contents shall include but not be limited to the following:
 - a. The average daily production of air dried unbleached pulp from chips and from the OCC process.
 - b. Process or control equipment operating parameters when required to demonstrate compliance with a limit.
 - c. The daily maximum and average concentration, in the units of the standard, for each pollutant monitored on a continuous basis.
 - d. The duration and nature of any monitor down-time.
 - e. Results of any monitor audits or accuracy checks.
 - f. Results of any stack tests using approved Ecology or EPA test methods with acceptable QA/QC.

For each occurrence of monitored emissions or process parameters in excess of the standard the report shall include the following:

- g. The time of the occurrence.
 - h. Magnitude of the emission or process parameters excess.
 - i. The duration of the excess.
 - j. The probable cause.
 - k. Any corrective actions taken or planned.
 - l. Any other agency contacted.
 - m. Signature of responsible person.
- 8 and 9. Reserved.
10. Wind speed and direction shall be continuously measured and recorded. Any change in location of the sensory equipment shall be approved in advance by the department. Monitoring records shall be maintained at the mill.
11. Operating and maintenance manuals for all equipment that has the potential to affect emissions to the atmosphere shall be developed and followed. Copies of the manuals shall be available to the department. Emissions that result from a failure to follow the requirements of the manuals may be considered proof that the equipment was not properly operated and maintained.

12. Operation of the equipment must be conducted in compliance with all data and specifications submitted as part of PSD and NOC applications unless otherwise approved by the department.
- 13 and 14. Reserved.
15. Ecology may modify conditions contained herein based on air quality, emissions monitoring results, or upon the request of PTPC.
16. Power Boiler #10 shall comply with all the applicable requirements of the new source performance standards for fossil-fuel-fired-steam generators in 40 CFR Part 60 Subpart D.
- 17 and 18. Reserved.

Nothing in this order shall be construed as obviating compliance with any requirement of law other than those imposed pursuant to the Washington Clean Air Act and rules and regulations thereunder.

Failure to comply with this Order may result in the issuance of civil penalties or other actions, whether administrative or judicial, to enforce the terms of this Order.

Authorization may be modified, suspended or revoked in whole or part for cause including, but not limited to, the following:

1. Violation of any terms or conditions of this authorization.
2. Obtaining this authorization by misrepresentation or failure to disclose fully all relevant facts.

The provisions of this authorization are severable and, if any provision of this authorization, or application of any provision of this authorization to any circumstance, is held invalid, the application of such provision to their circumstances and the remainder of this authorizations, shall not be affected thereby.

DATED this ____ day of _____, 200__ at Olympia, Washington.

Merley F. McCall
Industrial Section Supervisor
Solid Waste & Financial Assistance Program

Table 1 - Emission Limits and Monitoring and Reporting Requirements

A. Recovery Furnace

	Parameter	Limit (shall not exceed)	Monitoring & Reporting
A.1a	Particulate	0.08 gr/dscf @ 8% O ₂ , one hour average.	Sample monthly using EPA Method 5 except that the permittee may conduct one test of at least one hour in lieu of three 1-hour tests. Report test results monthly.
A.1b	Particulate	0.05 gr/dscf @ 8% O ₂ , one hour average. This Condition, issued pursuant to authorities set forth in WAC 173-400-131, is not federally enforceable under the federal Clean Air Act.	Sample monthly using EPA Method 5 except that the permittee may conduct one test of at least one hour in lieu of three 1-hour tests. Report test results monthly.
A.4	TRS	5.0 ppm @ 8% O ₂ , 24 hour average. This Condition, issued pursuant to authorities set forth in WAC 173-405-040(1)(c), is not federally enforceable under the federal Clean Air Act.	Monitor continuously using an approved CEM that conforms to 40 CFR 60, App. F and App. B, Perf. Spec. 5. Report excursions monthly.
A.5	O ₂	no limit - required to correct TRS data	Monitor continuously using an approved CEM that conforms to 40 CFR 60, App. F and App. B, Perf. Spec. 3.
A.6	Source test monitoring	Report monitored parameters in monthly air report	Report the following parameters as described: 1. Average opacity during source test run. 2. Sufficient data for each source test run to allow verification of source test results. 3. Report ESP flow split. 4. Report averages during source test runs of black liquor flow rate, density, and % solids. 5. Alternatively to 4, PTPC may estimate the total solids fired during the source test run. 6. Log and report the hourly primary and secondary voltage and current, and spark rate (if available) for each TRC unit during the source test.

C. Lime Kiln

	Parameter	Limit (shall not exceed)	Monitoring & Reporting
C.4	TRS	8 ppm @ 10% O ₂ , 12 hour average per 40 CFR 60.283(a)(5).	Monitor continuously using an approved CEM that conforms to 40 CFR 60, App. F and App. B, Perf. Spec. 5. Report excursions monthly.
C.5	O ₂	no limit - required to correct TRS data	Monitor continuously using an approved CEM that conforms to 40 CFR 60, App. F and App. B, Perf. Spec. 3.

D. Power Boiler #10

- 1d. Compliance with 40 CFR Subpart D SO₂ emission limits shall be met using fuels receipts until such time as:
 - a. 40 cfr 60.45(d) describing a fuel monitoring program is completed, or
 - 32 PTPC receives EPA approval of an alternative monitoring method. Before using this option, PTPC shall submit a copy of the EPA approval letter with the approved alternative monitoring program and reporting requirements to the Department.

Should a or b occur, the SO₂ monitoring requirement will be revised to reflect the EPA requirements.

F. Millwide Limits

	Parameter	Limit (shall not exceed)	Monitoring & Reporting
F.1	Particulate	729 tons/yr	Monitoring and reporting method 1.
F.3	SO ₂	1300 tons/yr	Monitoring and reporting method 1.

Monitoring and reporting method 1:

Compliance determined by adding calendar year emissions from all applicable units*. Emissions from a unit for which the pollutant is measured shall be calculated using the average of test results collected during the year. Emissions from a unit for which the pollutant is not measured shall be calculated using emission factors and production data or fuel consumption. Report annually within 30 days of the end of the calendar year.

* Applicable units for the particulate and SO₂ limit include the recovery furnace, smelt dissolver tank, lime kiln, and power boiler #10.